

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

PHOTOGRAPHIC ILLUSTRATORS
CORPORATION,

Plaintiff,

v.

INTERNATIONAL LIGHTING
CORP. D/B/A INTERLIGHT,

Defendant.

CIVIL ACTION NO.: 1:14-cv-14256

COMPLAINT AND JURY DEMAND

Plaintiff Photographic Illustrators Corporation (“PIC” or “Plaintiff”) brings this civil action against Defendant International Lighting Corp., d/b/a Interlight (“Interlight” or “Defendant”).

THE PARTIES

1. PIC is a Massachusetts corporation with a place of business at 467 Sagamore Street, Hamilton, Massachusetts 01936.

2. Upon information and belief, Defendant Interlight is an Indiana corporation whose principal office is located at 7939 New Jersey Avenue, Hammond, Indiana 46323.

JURISDICTION AND VENUE

3. This is a civil action for injunctive relief and damages for violation of the copyright laws of the United States, 17 U.S.C. §§ 101, et seq.; the Digital Millennium Copyright Act, 17 U.S.C. §§ 1201, et seq.; the Lanham Act, 15 U.S.C. §§ 1051, et seq.; and for unfair and deceptive trade practices in violation of Mass. Gen. L. ch. 93A. Jurisdiction over the state law claim is proper under 28 U.S.C. § 1367.

4. The amount in controversy exceeds \$75,000, exclusive of interests and costs, and is between citizens of different states. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1332, and 1338.

5. Interlight does business in Massachusetts.

6. Interlight operates a website (www.interlight.biz).

7. Interlight's website is accessible from Massachusetts.

8. Through its website, Interlight advertises, sells, and offers for sale lighting products to online visitors, including online visitors located in Massachusetts, and invites visitors to its website to create online accounts.

9. Interlight does not exclude Massachusetts consumers from visiting, interacting with, or making purchases through its website.

10. This Court has personal jurisdiction over Interlight because Interlight: has transacted business in Massachusetts; has contracted to supply products in Massachusetts; and has injured PIC in Massachusetts by reproducing and distributing PIC's copyrighted images on Interlight's website (which can be accessed in Massachusetts) to advertise and sell products.

11. Venue is proper in this judicial district under 28 U.S.C. §§ 1391.

PIC'S COPYRIGHTED IMAGES

12. PIC specializes in photography, including photography of consumer products for catalogs, advertising, and product packaging.

13. Over a span of years dating back to the 1960s, various companies, including Osram Sylvania, Inc. ("Sylvania"), have retained PIC to photograph certain of their products.

14. PIC authored the 40 photographic images referenced in this Complaint (the "PIC Images").

15. Each of the PIC Images is a photograph of a Sylvania product that PIC created.

16. PIC retains ownership of all right, title, and interest in the copyrights for the PIC Images.

17. 32 of the PIC Images were made the subject of applications which matured into United States Copyright Registration Certificate Nos. VA 1-321-513, VA 1-325-168, VA 1-359-243, VA 1-359-244, VA 1-884-805, VA 1-884-811, VA 1-916-393, VA 1-916-402, VA 1-916-412, VA 1-916-418, VA 1-916-428, VA 1-916-443, VA 1-916-447, VA 1-916-450, VA 1-916-456, VA 1-917-076, VA 1-917-079, VA 1-917-094, and VA 1-917-096 (attached as Exhibit A, Exhibit B, Exhibit C, Exhibit D, Exhibit E, Exhibit F, Exhibit G, Exhibit H, Exhibit I, Exhibit J, Exhibit K, Exhibit L, Exhibit M, Exhibit N, Exhibit O, Exhibit P, Exhibit Q, Exhibit R, and Exhibit S).

18. 7 of the PIC Images were made the subject of applications for copyright registration which were received by the United States Copyright Office on June 21, 2013. These applications for registration were complete and submitted in proper form with the appropriate filing fees.

19. 1 of the PIC Images was made the subject of an application for copyright registration which was received by the United States Copyright Office on November 10, 2014. This application for registration was complete and submitted in proper form with the appropriate filing fee.

20. Interlight's infringement of the copyright in each PIC Image began after PIC's first publication of that PIC Image.

21. Before publishing the PIC Images, PIC attaches, or includes therewith, the name of the author (Paul Kevin Picone), copyright owner (P.I. Corp.) and copyright notice (collectively, "PIC Copyright Management Information"), as shown in the examples below:





INTERLIGHT'S UNAUTHORIZED ALTERATION AND USE OF PIC IMAGES

22. As depicted in the 55 sets of images below, each of the images displayed on Interlight's website, www.interlight.biz ("Accused Images"), is a copy, in whole or in part, of one of the PIC Images.

23. On information and belief, Interlight altered copies of the PIC Images for use on Interlight's website through the use of image editing software, such as "Adobe Photoshop." PIC's unique orientation of the products, the location of the shadows and reflections, and the pattern of the background are visible in multiple Accused Images, as indicated below, despite Interlight's removal of products in the PIC Images or other attempts to change the PIC Images. Vestiges of these unique elements in the PIC Images are visible in multiple Accused Images, despite Interlight's unsuccessful attempts to remove them.

24. On information and belief, Interlight also removed PIC Copyright Management Information from all of the PIC Images and added its own copyright management information, "www.interlight.biz," as indicated below.

PIC Images	Interlight's Infringing Copy
	

Examples of Accused Images with False Copyright Management Information

25. On information and belief, Interlight intended to mask its copyright infringement by claiming ownership of the PIC Images through placement of the false copyright management information.



26. Interlight has copied, distributed, and/or used—and continues to copy, distribute, and/or use—the PIC Images, at least on its website, to advertise and sell products, including products which are not the subjects of the misappropriated PIC Images.

27. Interlight has never been, and is not currently, licensed by PIC to copy, distribute, and/or use the PIC Images.

28. On information and belief, Interlight has never been, and is not currently, licensed by Sylvania to copy, distribute, and/or use the PIC Images.

29. Interlight has never been, and is not currently, licensed by Sylvania to copy, distribute, and/or use the PIC Images with a false Interlight watermark attached thereto, nor to advertise products of companies other than Sylvania.

30. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on June 21, 2013 (Reg. No. VA 1-917-096). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="345 926 667 957">29121 CF4 EL decor.tif</p>	
 <p data-bbox="386 1871 1252 1902">https://www.interlight.biz/light-bulb/CF4EL/DECO/CANDELABR</p>	

31. The above-captured webpage is owned and operated by Interlight.

32. The above-captured webpage includes a PIC Image.

33. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

34. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

35. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.


36. PIC never authorized this use of the PIC Image.

37. Sylvania never authorized this use of the PIC Image.

38. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

39. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

40. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on June 21, 2013 (Reg. No. VA 1-917-096). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p>29121 CF4 EL decor.tif</p>	
	 <p>https://www.interlight.biz/light-bulb/GE-GENERAL-ELECTRIC-G.E-FLE5/2/CAC/827</p>

41. The above-captured webpage is owned and operated by Interlight.

42. The above-captured webpage includes a PIC Image.

43. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

44. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

45. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.

46. PIC never authorized this use of the PIC Image.

47. Sylvania never authorized this use of the PIC Image.

48. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

49. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

50. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (Reg. No. VA 1-916-450). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="228 957 781 993">SglEnd70&150w_64360_64366 copy.TIF</p>	
	 <p data-bbox="386 1854 1253 1883">https://www.interlight.biz/light-bulb/AH-LIGHTING-MH/70W/DE</p>

51. The above-captured webpage is owned and operated by Interlight.

52. The above-captured webpage includes a PIC Image.

53. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

54. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

55. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.



56. PIC never authorized this use of the PIC Image.

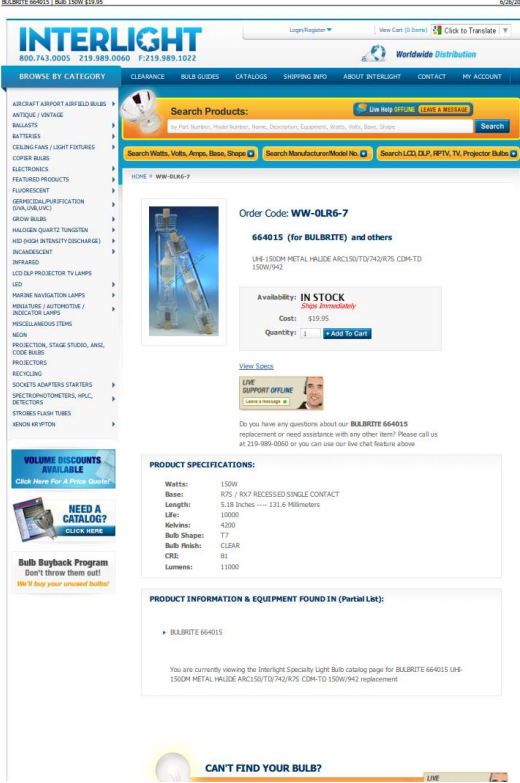
57. Sylvania never authorized this use of the PIC Image.

58. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

59. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

60. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (Reg. No. VA 1-916-450). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="228 972 781 1003">SglEnd70&150w_64360_64366 copy.TIF</p>	



INTERLIGHT
800.743.0005 219.989.0060 F:219.989.1022

Log In/Registration View Cart (0 Items) Click to Translate Worldwide Distribution

BROWSE BY CATEGORY

- AIRCRAFT AIRPORT AIRFIELD BULBS
- ANTIQUE / VINTAGE
- BALLASTS
- BATTERIES
- COLORING / LIGHT FIXTURES
- COPPER BULBS
- ELECTRONICS
- FEATURED PRODUCTS
- FLUORESCENT
- GERMIDAL/PURIFICATION (GROW/BLVD)
- GROW BULBS
- HALOGEN QUARTZ TUNGSTEN
- HIGH INTENSITY DISCHARGE
- INCANDESCENT
- IRIDIUM
- LED AIR PROJECTOR TV LAMPS
- LED
- NAVIGATION LAMPS
- RECYCLING / AUTOMOTIVE / INDICATOR LAMPS
- WIRELESS ITEMS
- NEON
- PROJECTOR, STAGE STUDIO, ANGLE, COOL BULBS
- PROJECTORS
- RECYCLING
- SOCKETS/ADAPTERS/STARTERS
- SPECTROPHOTOMETERS, WPC, DETECTORS
- STRONG FLASH TUBES
- XENON KRYPTON

Search Products:

By Part Number, Model Number, Name, Description, Equipment, Bulb, Tube, Base, Shape

Search Watts, Volts, Amps, Base, Shape Search Manufacturers/Model No. Search LCD, DLP, HDTV, TV, Projector Bulbs

HOME » WWW-OLR6-7

Order Code: WW-OLR6-7

664015 (for BULBRITE) and others

U4-1500M METAL HALIDE ARC150/TD/742/R7S CDH-TD 150W/942

Availability: IN STOCK

Cost: \$15.95

Quantity: 1 Add To Cart

View Specs

LIVE SUPPORT OFFLINE

Do you have any questions about our BULBRITE 664015 replacement or need assistance with any other item? Please call us at 219-989-0060 or you can use our live chat feature above

PRODUCT SPECIFICATIONS:

Wattage:	150W
Base:	R7S / R7X RECESSED SINGLE CONTACT
Length:	5.18 inches ---- 131.6 Millimeters
Life:	10000
Volts:	4200
Bulb Shape:	T7
Bulb Finish:	CLEAR
CRI:	81
Lumens:	11000

PRODUCT INFORMATION & EQUIPMENT FOUND IN (Partial List):

- BULBRITE 664015

You are currently viewing the Interlight Specialty Light Bulb catalog page for BULBRITE 664015 U4-1500M METAL HALIDE ARC150/TD/742/R7S CDH-TD 150W/942 replacement

CAN'T FIND YOUR BULB?

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<https://www.interlight.biz/light-bulb/BULBRITE-664015>

61. The above-captured webpage is owned and operated by Interlight.

62. The above-captured webpage includes a PIC Image.

63. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

64. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

65. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.

66. PIC never authorized this use of the PIC Image.

67. Sylvania never authorized this use of the PIC Image.

68. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

69. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

70. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (Reg. No. VA 1-916-443). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="363 921 647 953">CF9EL_G25 copy.tif</p>	
	 <p data-bbox="509 1871 1130 1898">https://www.interlight.biz/light-bulb/BFG16E27</p>

71. The above-captured webpage is owned and operated by Interlight.

72. The above-captured webpage includes a PIC Image.

73. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

74. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

75. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.



76. PIC never authorized this use of the PIC Image.

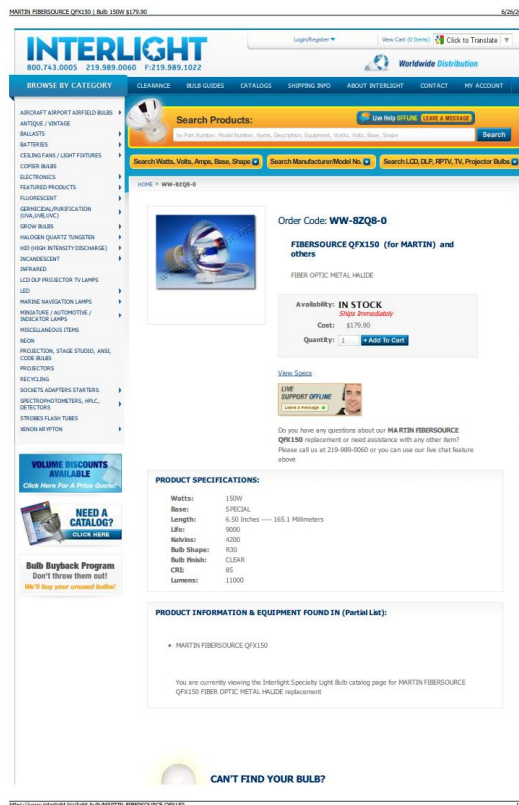
77. Sylvania never authorized this use of the PIC Image.

78. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

79. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

80. In the table below, the image on the top left was authored by PIC. It was received by the Copyright Office on June 21, 2013. The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="354 905 659 940">150HQI-R_64339.TIF</p>	



The screenshot shows the Interlight website interface. At the top, there's a header with the company name 'INTERLIGHT' and contact information. Below this is a navigation bar with links like 'BROWSE BY CATEGORY', 'CLEARANCE', 'BULB GUIDES', 'CATALOGS', 'SHIPPING INFO', 'ABOUT INTERLIGHT', 'CONTACT', and 'MY ACCOUNT'. A search bar is prominently displayed in the center. On the left side, there's a 'BROWSE BY CATEGORY' menu listing various bulb types. The main content area features a product image of the 150HQI-R bulb, its order code 'WW-SZQS-0', and availability status 'IN STOCK'. Below this, there's a 'PRODUCT SPECIFICATIONS' table and a 'PRODUCT INFORMATION & EQUIPMENT FOUND IN (Partial List)' section. At the bottom, there's a 'CAN'T FIND YOUR BULB?' link.

PRODUCT SPECIFICATIONS:	
Wattage:	150W
Base:	SPECIAL
Length:	6.50 inches ---- 165.1 Millimeters
Life:	9000
Volts:	4200
Bulb Shape:	Q150
Bulb Finish:	CLEAR
CRI:	95
Lumen:	11000

<https://www.interlight.biz/light-bulb/MARTIN-FIBERSOURCE-QFX150>

81. The above-captured webpage is owned and operated by Interlight.

82. The above-captured webpage includes a PIC Image.

83. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

84. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

85. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.

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87. Sylvania never authorized this use of the PIC Image.

88. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

89. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

90. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on October 25, 2013 (Reg. No. VA 1-916-393). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="313 827 699 863">Crystal_Halogen_A_line.jpg</p>	
	 <p data-bbox="386 1835 1256 1871">https://www.interlight.biz/light-bulb/SATCO-75A/HAL/CRYSTAL</p>

91. The above-captured webpage is owned and operated by Interlight.

92. The above-captured webpage includes a PIC Image.

93. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

94. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

95. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.

96. PIC never authorized this use of the PIC Image.

97. Sylvania never authorized this use of the PIC Image.

98. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

99. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

100. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on October 24, 2013 (Reg. No. VA 1-884-805). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p>OT 20_120.tif</p>	
<p>BULBRITE 800096 Bulb 24V \$125.00</p>  <p>1 of 2</p>	<p>https://www.interlight.biz/light-bulb/BULBRITE-800096</p>

101. The above-captured webpage is owned and operated by Interlight.

102. The above-captured webpage includes a PIC Image.

103. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

104. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

105. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.



106. PIC never authorized this use of the PIC Image.

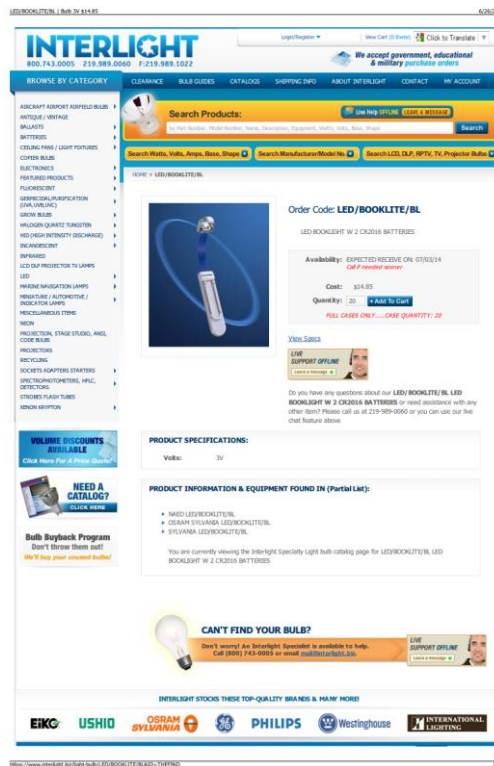
107. Sylvania never authorized this use of the PIC Image.

108. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

109. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

110. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on November 28, 2005 (VA 1-321-513). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="358 974 623 1008">LED Booklight.jpg</p>	



<https://www.interlight.biz/light-bulb/LED/BOOKLITE/BL&ID=THEFIND>

- 111. The above-captured webpage is owned and operated by Interlight.
- 112. The above-captured webpage includes a PIC Image.
- 113. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

- 114. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.
- 115. PIC never authorized this use of the PIC Image.
- 116. Sylvania never authorized this use of the PIC Image.
- 117. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

118. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on November 28, 2005 (VA 1-325-168). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="427 989 557 1024">BR40.jpg</p>	
	 <p data-bbox="329 1812 1287 1845">https://www.interlight.biz/light-bulb/FEIT-ELECTRIC-ESL18R40H/ECO</p>

119. The above-captured webpage is owned and operated by Interlight.

120. The above-captured webpage includes a PIC Image.

121. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

122. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.

123. PIC never authorized this use of the PIC Image.

124. Sylvania never authorized this use of the PIC Image.

125. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

126. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on May 30, 2006 (VA 1-359-244). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="355 840 626 877">LED Worklight.jpg</p>	
	 <p data-bbox="479 1837 1133 1869">https://www.interlight.biz/light-bulb/NAED-72088</p>

- 127. The above-captured webpage is owned and operated by Interlight.
- 128. The above-captured webpage includes a PIC Image.
- 129. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

- 130. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.
- 131. PIC never authorized this use of the PIC Image.
- 132. Sylvania never authorized this use of the PIC Image.
- 133. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

134. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (VA 1-916-450). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p>XBO 75W_2 8_01 copy.TIF</p>	
 <p>https://www.interlight.biz/light-bulb/CARLEY-70083</p>	

135. The above-captured webpage is owned and operated by Interlight.

136. The above-captured webpage includes a PIC Image.

137. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

138. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.

139. PIC never authorized this use of the PIC Image.

140. Sylvania never authorized this use of the PIC Image.

141. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

142. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (VA 1-916-450). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="245 961 737 997">PO-Ent Brochure, Panel 5 copy.TIF</p>	
 <p data-bbox="444 1843 1175 1877">https://www.interlight.biz/light-bulb/HTI%20250W/32C</p>	

143. The above-captured webpage is owned and operated by Interlight.

144. The above-captured webpage includes a PIC Image.

145. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

146. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.

147. PIC never authorized this use of the PIC Image.

148. Sylvania never authorized this use of the PIC Image.

149. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

150. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (VA 1-916-447). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="332 1003 651 1037">29116 13w minitwist.tif</p>	
 <p data-bbox="440 1843 1175 1873">https://www.interlight.biz/light-bulb/BULBRITE-509014</p>	

- 151. The above-captured webpage is owned and operated by Interlight.
- 152. The above-captured webpage includes a PIC Image.
- 153. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

- 154. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.
- 155. PIC never authorized this use of the PIC Image.
- 156. Sylvania never authorized this use of the PIC Image.
- 157. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

158. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (VA 1-916-443). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="342 1010 641 1045">CF14EL_R20 copy.tif</p>	
 <p data-bbox="428 1808 1185 1839">https://www.interlight.biz/light-bulb/EIKO-SP14/R20/41K</p>	

159. The above-captured webpage is owned and operated by Interlight.

160. The above-captured webpage includes a PIC Image.

161. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

162. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.

163. PIC never authorized this use of the PIC Image.

164. Sylvania never authorized this use of the PIC Image.

165. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

166. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (VA 1-916-443). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="354 955 628 989">CF22EL_PAR38.tif</p>	
	 <p data-bbox="440 1860 1174 1892">https://www.interlight.biz/light-bulb/EIKO-WW-A8S9-4</p>

- 167. The above-captured webpage is owned and operated by Interlight.
- 168. The above-captured webpage includes a PIC Image.
- 169. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

- 170. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.
- 171. PIC never authorized this use of the PIC Image.
- 172. Sylvania never authorized this use of the PIC Image.
- 173. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

174. In the table below, the image on the top left was authored by PIC. It was received by the Copyright Office on June 21, 2013. The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="527 955 649 982">© Special Circumstances / P.I. Corp</p> <p data-bbox="263 997 717 1033">70&150w_64354_64356 copy.TIF</p>	
	 <p data-bbox="576 1081 1039 1102">http://www.interlight.biz/light-bulb/HQI-SE400/DX</p>

<https://www.interlight.biz/light-bulb/HQI-SE400/DX>

175. The above-captured webpage is owned and operated by Interlight.

176. The above-captured webpage includes a PIC Image.

177. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.



178. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.

179. PIC never authorized this use of the PIC Image.

180. Sylvania never authorized this use of the PIC Image.

181. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

182. In the table below, the image on the top left was authored by PIC. It was received by the Copyright Office on June 21, 2013. The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="326 884 654 915">HMI 6000 SE.2TIF.TIF</p>	



GE GENERAL ELECTRIC G.E. 48467 / Bulb 6000W 120V 82154.12

INTERLIGHT
800.743.0005 219.989.0060 F:219.989.1022

Log In/Register View Cart (0 items) Click to Translate

Some Day Shipping as in-stock items. Orders must be received prior to 5:00pm ET.

BROWSE BY CATEGORY: AIRCRAFT AIRPORT AIRFIELD BULBS, ANTIQUE / VINTAGE, BALLASTS, BATTERIES, CEILING FANS / LIGHT FIXTURES, COOPER BULBS, ELECTRONICS, FEATURED PRODUCTS, FLUORESCENT, GEOMEDICAL/PURIFICATION (EWA,DAV,LOC), GLOW BULBS, HALOGEN QUARTZ TUNGSTEN HED (HIGH INTENSITY DISCHARGE), INCANDESCENT, INFRARED, LCD DLP PROJECTOR TV LAMPS, LED, MARINE NAVIGATION LAMPS, MESA/LAMP / AUTOMOTIVE / INDICATOR LAMPS, MISCELLANEOUS ITEMS, NEON, PROJECTOR, STAGE STROBE, AMPLI CODE BULBS, PROJECTORS, RECYCLING, SOCIETY ADAPTERS STARTERS, SPECTROPHOTOMETERS, MPAL, DETECTORS, STROBE FLASH TUBES, XENON REFLIGHT

Search Products: For Part Number, Model Number, Name, Description, Endmark, Watts, Volts, Base, Shape

Search Watts, Volts, Amps, Base, Shape Search Manufacturer/Model No. Search L2/L3, DLP, RPTV, TV, Projector Bulbs

HOME > WW-1W01-4

Order Code: WW-1W01-4

48467 (for GE GENERAL ELECTRIC G.E.) and others

6000W

Availability: **IN STOCK**
Ship Immediately

Cost: \$2154.12

Quantity: 1 Add To Cart

View Specs

LIVE SUPPORT OFFLINE
Leave a Message

Do you have any questions about our GE GENERAL ELECTRIC G.E. 48467 replacement or need assistance with any other item? Please call us at 219-989-0060 or you can use our live chat feature above

PRODUCT SPECIFICATIONS:

Wattage:	6000W
Voltage:	120V
Amps:	48.75A
Base:	G238 2-PIN
Length:	14.17 inches — 360.0 Millimeters
Lifes:	250
Watt/hr:	6000
Lumens:	600000

PRODUCT INFORMATION & EQUIPMENT FOUND IN (Partial List):

- GE GENERAL ELECTRIC G.E. 48467

You are currently viewing the Interlight Specialty Light Bulb catalog page for GE GENERAL ELECTRIC G.E. 48467 6000W replacement

CAN'T FIND YOUR BULB?

https://www.interlight.biz/light-bulb/GE-GENERAL-ELECTRIC-G.E-48467 173

<https://www.interlight.biz/light-bulb/GE-GENERAL-ELECTRIC-G.E-48467>

183. The above-captured webpage is owned and operated by Interlight.

184. The above-captured webpage includes a PIC Image.

185. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

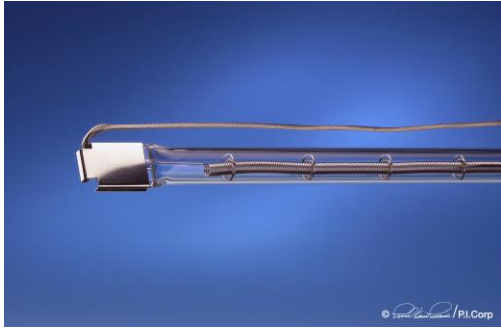

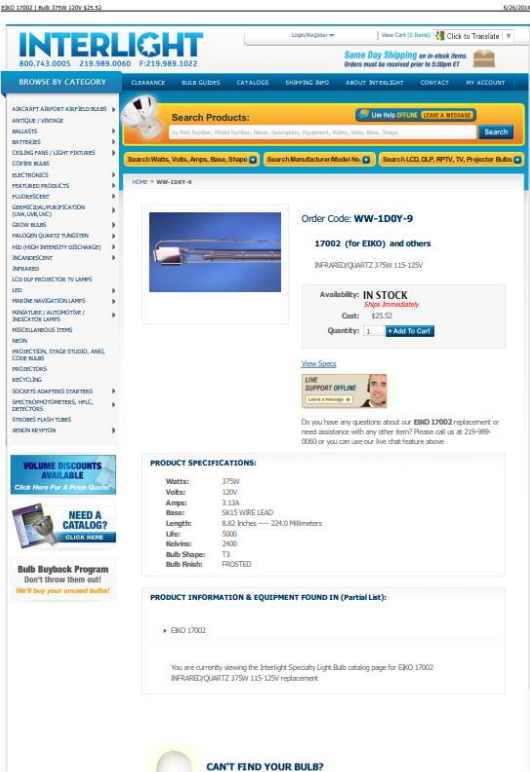
186. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.

187. PIC never authorized this use of the PIC Image.

188. Sylvania never authorized this use of the PIC Image.

189. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

190. In the table below, the image on the top left was authored by PIC. It was received by the Copyright Office on June 21, 2013. The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="251 865 727 898">IR Quartz Nickel FlexEnd CL.TIF</p>	
 <p data-bbox="483 1827 1128 1858">https://www.interlight.biz/light-bulb/EIKO-17002</p>	

- 191. The above-captured webpage is owned and operated by Interlight.
- 192. The above-captured webpage includes a PIC Image.
- 193. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

- 194. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.
- 195. PIC never authorized this use of the PIC Image.
- 196. Sylvania never authorized this use of the PIC Image.
- 197. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

198. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on June 21, 2013 (VA 1-917-079). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="204 840 779 873">G2 linear Motion sensor_angle_layered.tif</p>	
	 <p data-bbox="289 1814 1325 1845">https://www.interlight.biz/light-bulb/LED/MOTIONSENSOR/LINEAR/2PK/CB</p>

199. The above-captured webpage is owned and operated by Interlight.

200. The above-captured webpage includes a PIC Image.

201. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

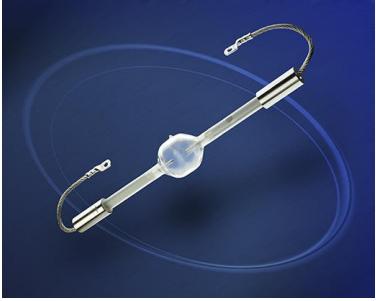

202. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.

203. PIC never authorized this use of the PIC Image.

204. Sylvania never authorized this use of the PIC Image.

205. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

206. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (VA 1-916-428). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="378 842 605 873">HMI 12000W.tif</p>	

CMC 18000 | Bulb 18000W \$220.00 6/26/2014

INTERLIGHT
800.743.0005 219.989.0060 F:219.989.1022

Log In Register View Cart (0 Items) Click to Translate


Worldwide Distribution

BROWSE BY CATEGORY: AIRCRAFT AIRPORT ASPHALT BULBS, ANTI-CORROSION, BALLASTS, BATTERIES, CEILING FANS / LIGHT FIXTURES, COPIER BULBS, ELECTRONICS, FEATURED PRODUCTS, FLUORESCENT, GEOMETRIC/MULTIPLICATION (LUMINOUS), GLOW BULBS, HALOGEN QUARTZ HALOGEN, HIGH-INTENSITY DISCHARGE, INCANDESCENT, IR INFRARED, LED, LCD-CLIP PROJECTOR TV LAMPS, LED, MAGNETIC NAVIGATION LAMPS, MINATURE / AUTOMOTIVE / INDICATOR LAMPS, MISCELLANEOUS ITEMS, NEON, PROJECTION, STAGE STUDIO, AND, COOL BULBS, PROJECTORS, RECYCLING, SECURITY LIGHTING SYSTEMS, SPECTROPHOTOMETRIC, HVC, DETECTORS, STROBE FLASH TUBES, X-RAY VENTILATION

Search Products:

Search Watts, Volts, Amps, Base, Shape

HOME > WW-0Y2W-5



Order Code: **WW-0Y2W-5**

18000 (for CMC) and others

18,000 WATTS DOUBLE ENDED HMI-18000W/XS

Availability: **IN STOCK** Ship Immediately

Cost: \$2200.00

Quantity:

[View Specs](#)

LIVE SUPPORT OFFLINE

Do you have any questions about our CMC 18000 replacement or need assistance with any other item? Please call us at 219-989-0060 or you can use our live chat feature above.

PRODUCT SPECIFICATIONS:

Watts: 18000W

PRODUCT INFORMATION & EQUIPMENT FOUND IN (Partial List):

- CMC 18000

You are currently viewing the Interlight Specialty Light Bulb catalog page for CMC 18000 18,000 WATTS DOUBLE ENDED HMI-18000W/XS replacement

CAN'T FIND YOUR BULB?
Don't worry! An Interlight Specialist is available to help. Call (800) 743-0005 or email mail@interlight.biz

LIVE SUPPORT OFFLINE

INTERLIGHT STOCKS THESE TOP-QUALITY BRANDS & MANY MORE!

<https://www.interlight.biz/light-bulb/CMC-18000> 1/77

<https://www.interlight.biz/light-bulb/CMC-18000>

207. The above-captured webpage is owned and operated by Interlight.

208. The above-captured webpage includes a PIC Image.

209. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.



210. The above-capture webpage uses a PIC Image to advertise non-Sylvania products.

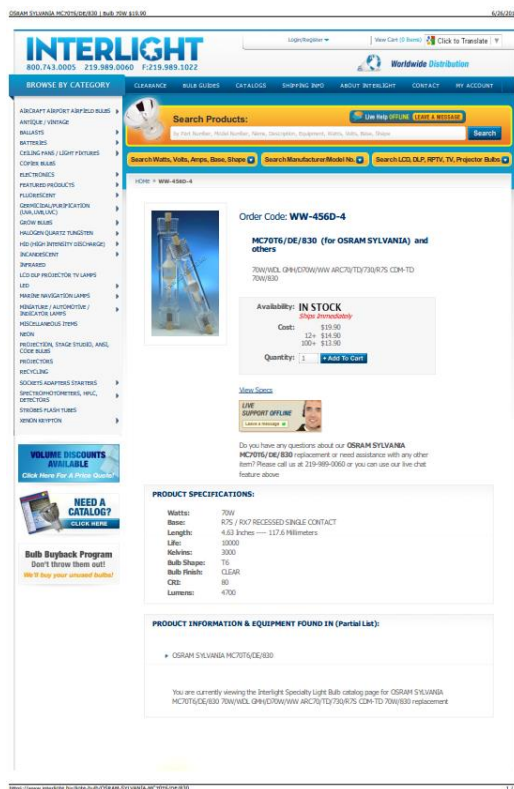
211. PIC never authorized this use of the PIC Image.

212. Sylvania never authorized this use of the PIC Image.

213. Sylvania never authorized Interlight to use this PIC Image to advertise non-Sylvania products.

214. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (VA 1-916-450). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

<p>PIC Image</p>	<p>Interlight's Infringing Copy</p>
 <p>The image shows a medical device, likely a catheter or probe, with a clear plastic sheath and a yellow handle. It is positioned vertically against a blue background. The device has a small, rectangular, yellowish component near the top of the handle.</p> <p>SglEnd70&150w_64360_64366 copy.TIF</p>	 <p>This image is a copy of the PIC image, showing the same medical device. However, it contains a diagonal watermark that reads "www.interlight.com" across the center of the device.</p>



<https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-MC70T6/DE/830>

215. The above-captured webpage is owned and operated by Interlight.

216. The above-captured webpage includes a PIC Image.

217. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

218. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

219. PIC never authorized this use of the PIC Image.

220. Sylvania never authorized this use of the PIC Image.

221. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

222. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (VA 1-916-447). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="354 877 630 913">Sharx_base copy.tif</p>	
 <p data-bbox="537 1780 704 1793">https://www.interlight.biz/light-bulb/SYLVANIA-046135690044</p>	

<https://www.interlight.biz/light-bulb/SYLVANIA-046135690044>

223. The above-captured webpage is owned and operated by Interlight.

224. The above-captured webpage includes a PIC Image.

225. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

226. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

227. PIC never authorized this use of the PIC Image.

228. Sylvania never authorized this use of the PIC Image.

229. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

230. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (VA 1-916-443). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="349 934 633 972">CF9EL_G25 copy.tif</p>	
	 <p data-bbox="443 1869 1170 1898">https://www.interlight.biz/light-bulb/SYLVANIA-29414</p>

231. The above-captured webpage is owned and operated by Interlight.

232. The above-captured webpage includes a PIC Image.

233. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.



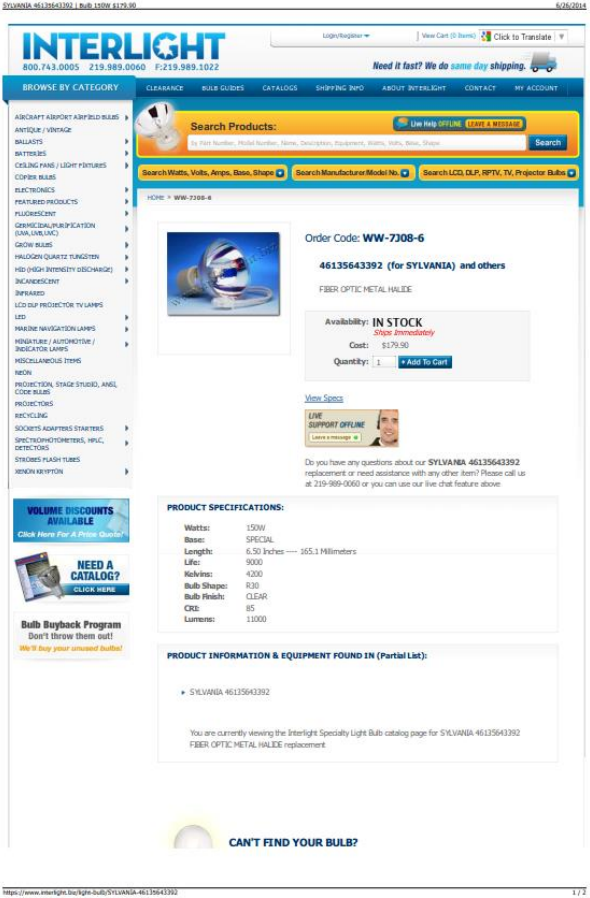
234. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

235. PIC never authorized this use of the PIC Image.

236. Sylvania never authorized this use of the PIC Image.

237. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

238. In the table below, the image on the top left was authored by PIC. It was received by the Copyright Office on June 21, 2013. The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="337 804 644 842">150HQI-R_64339.TIF</p>	
 <p data-bbox="396 1850 1219 1879">https://www.interlight.biz/light-bulb/SYLVANIA-46135643392</p>	

239. The above-captured webpage is owned and operated by Interlight.

240. The above-captured webpage includes a PIC Image.

241. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.


242. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

243. PIC never authorized this use of the PIC Image.

244. Sylvania never authorized this use of the PIC Image.

245. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

246. In the table below, the image on the top left was authored by PIC. It was received by the Copyright Office on June 21, 2013. The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="337 804 644 842">150HQI-R_64339.TIF</p>	
	 <p data-bbox="443 1808 1170 1837">https://www.interlight.biz/light-bulb/SYLVANIA-64339</p>

247. The above-captured webpage is owned and operated by Interlight.

248. The above-captured webpage includes a PIC Image.

249. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

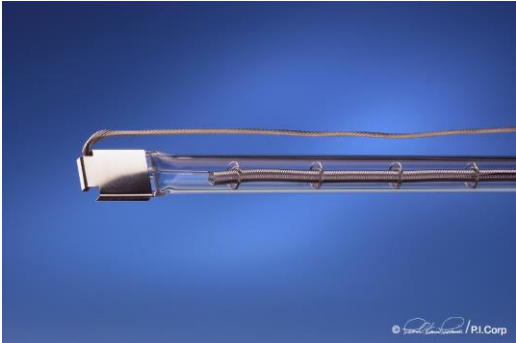

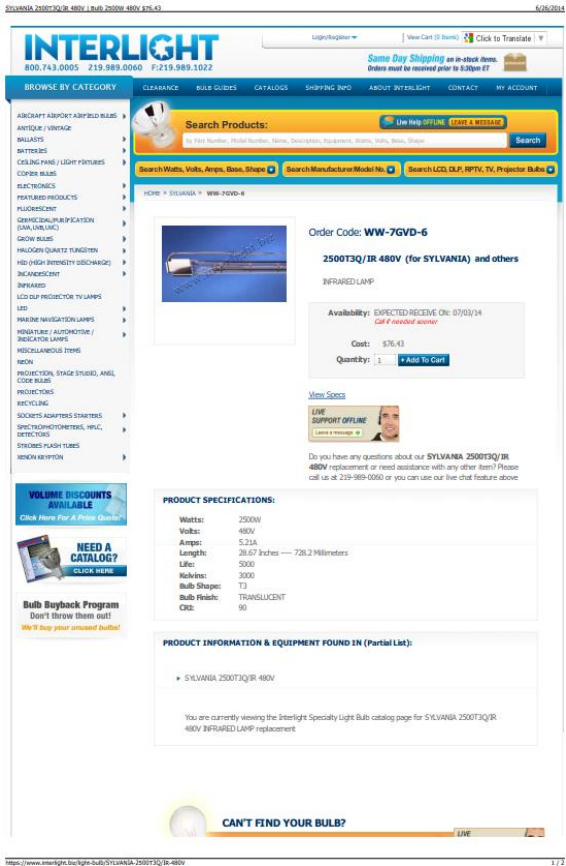
250. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

251. PIC never authorized this use of the PIC Image.

252. Sylvania never authorized this use of the PIC Image.

253. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

254. In the table below, the image on the top left was authored by PIC. It was received by the Copyright Office on June 21, 2013. The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="256 877 734 919">IR Quartz Nickel FlexEnd CL.TIF</p>	
 <p data-bbox="360 1852 1263 1883">https://www.interlight.biz/light-bulb/SYLVANIA-2500T3Q/IR-480V</p>	

255. The above-captured webpage is owned and operated by Interlight.

256. The above-captured webpage includes a PIC Image.

257. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.



258. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

259. PIC never authorized this use of the PIC Image.

260. Sylvania never authorized this use of the PIC Image.

261. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

262. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on June 21, 2013 (VA 1-917-096). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="332 976 657 1012">29121 CF4 EL decor.tif</p>	

 <p data-bbox="446 1858 1177 1894">https://www.interlight.biz/light-bulb/SYLVANIA-29121</p>	
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263. The above-captured webpage is owned and operated by Interlight.

264. The above-captured webpage includes a PIC Image.

265. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.



266. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

267. PIC never authorized this use of the PIC Image.

268. Sylvania never authorized this use of the PIC Image.

269. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

270. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on June 21, 2013 (VA 1-917-094). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p>CF9EL_deco_cand copy.tif</p>	



INTERLIGHT
800.743.0005 219.989.0060 F219.989.1022

Search Products:

Order Code: WW-7LCF-5

CF9EL/B10/C/DIM/827 (for SYLVANIA) and others

DIMMABLE COMPACT FLUOR WITH MEDIUM ADAPTER

Availability: **IN STOCK**
Cost: \$39.95
Quantity:
FULL CASES ONLY.....CASE QUANTITY: 6

PRODUCT SPECIFICATIONS:

Wattage:	5W
Voltage:	120V
Base:	E26 MEDIUM SCREW, 1-INCH DIAMETER (E27)
Length:	5.06 inches — 128.5 millimeters
Life:	25000
Wavelength:	2700
Bulb Shape:	B10
Bulb Finish:	WHITE
CRI:	82
Lumen:	200

PRODUCT INFORMATION & EQUIPMENT FOUND IN (Partial List):

- SYLVANIA CF9EL/B10/C/DIM/827

You are currently viewing the Interlight Specialty Light Bulb catalog page for SYLVANIA CF9EL/B10/C/DIM/827 DIMMABLE COMPACT FLUOR WITH MEDIUM ADAPTER replacement

<https://www.interlight.biz/light-bulb/SYLVANIA-CF5EL/B10/C/DIM/827>

271. The above-captured webpage is owned and operated by Interlight.

272. The above-captured webpage includes a PIC Image.

273. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.


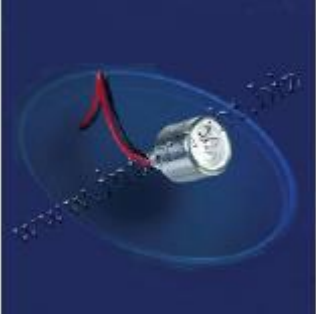

274. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

275. PIC never authorized this use of the PIC Image.

276. Sylvania never authorized this use of the PIC Image.

277. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

278. In the table below, the image on the top left was authored by PIC. It was received by the Copyright Office on June 21, 2013. The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="370 840 613 877">LED HF2Eye.jpg</p>	
 <p data-bbox="397 1837 1226 1864">https://www.interlight.biz/light-bulb/SYLVANIA-46135703966</p>	

279. The above-captured webpage is owned and operated by Interlight.

280. The above-captured webpage includes a PIC Image.

281. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

282. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

283. PIC never authorized this use of the PIC Image.

284. Sylvania never authorized this use of the PIC Image.

285. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

286. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on October 25, 2013 (VA 1-916-393). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="297 842 686 877">Crystal Halogen A_line.jpg</p>	
	 <p data-bbox="380 1843 1234 1877">https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-18906</p>

287. The above-captured webpage is owned and operated by Interlight.

288. The above-captured webpage includes a PIC Image.

289. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

290. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

291. PIC never authorized this use of the PIC Image.

292. Sylvania never authorized this use of the PIC Image.

293. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

294. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on October 25, 2013 (VA 1-916-402). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="370 840 610 873">LED HF Disk.jpg</p>	
<p data-bbox="451 924 1162 942">OSRAM SYLVANIA 70204 \$48.07 3.60W VOLTS BASE BULB ... https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-70204</p> <div data-bbox="500 972 1101 1743">  <p>The screenshot shows the Interlight website's product page for the OSRAM SYLVANIA 70204 LED module. The page includes a navigation menu on the left, a search bar at the top, and a detailed product description. The product specifications listed are: Watts: 3.60W, Kelvins: 4700, and Lumens: 75. The availability is noted as 'EXPECTED RECEIVE ON: 11/14/12'. The price is \$48.07. The page also features a 'Bulb Buyback Program' section and a 'CAN'T FIND YOUR BULB?' section with contact information.</p> </div>	
1 of 2	
11/7/12 10:25 AM	
https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-70204	

295. The above-captured webpage is owned and operated by Interlight.

296. The above-captured webpage includes a PIC Image.

297. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

298. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

299. PIC never authorized this use of the PIC Image.

300. Sylvania never authorized this use of the PIC Image.

301. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

302. In the table below, the image on the top left was authored by PIC. It was received by the Copyright Office on November 10, 2014. The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="527 940 649 961">© [Signature] / PI Corp</p> <p data-bbox="256 972 727 1005">MP400T16HOR Mogul_65912.jpg</p>	



The screenshot shows the Interlight website interface. At the top, there's a navigation bar with links like 'Home', 'About Us', 'Contact Us', etc. Below that is a search bar and a sidebar with various product categories. The main content area displays the product 'SYLVANIA 65912' with its specifications and a 'CANT FIND YOUR BULB?' section at the bottom.

PRODUCT SPECIFICATIONS:

Wattage:	400W
Base:	E29 MODEL SCREW BASE 29MM DIAMETER (S40)
Length:	11.00 Inches — 275.4 Millimeters
Life:	30000
Watt/Inch:	4000
Bulb Shape:	T16
Bulb Finish:	CLEAR
CRD:	65
Lumen:	46000

PRODUCT INFORMATION & EQUIPMENT FOUND IN (Partial List):

- SYLVANIA 65912

CANT FIND YOUR BULB?

Don't worry! An Interlight Specialist is available to help. Call (800) 743-0005 or email sales@interlight.biz

<https://www.interlight.biz/light-bulb/SYLVANIA-65912>

303. The above-captured webpage is owned and operated by Interlight.

304. The above-captured webpage includes a PIC Image.

305. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

306. The above-captured webpage includes a PIC Image with false Interlight copyright management information superimposed on the PIC Image.

307. PIC never authorized this use of the PIC Image.

308. Sylvania never authorized this use of the PIC Image.

309. Sylvania never authorized Interlight to use this PIC Image with superimposed false Interlight copyright management information.

310. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (VA 1-916-443). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="297 1045 686 1079">CF13EL_SuperMini copy.tif</p>	
 <p data-bbox="444 1864 1179 1892">https://www.interlight.biz/light-bulb/SYLVANIA-29711</p>	

311. The above-captured webpage is owned and operated by Interlight.

312. The above-captured webpage includes a PIC Image.

313. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

314. PIC never authorized this use of the PIC Image.

315. On information and belief, Sylvania never authorized this use of the PIC Image.

316. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (VA 1-916-443). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="342 974 639 1010">CF14EL_R20 copy.tif</p>	
	 <p data-bbox="443 1860 1170 1892">https://www.interlight.biz/light-bulb/SYLVANIA-29587</p>

317. The above-captured webpage is owned and operated by Interlight.

318. The above-captured webpage includes a PIC Image.

319. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

320. PIC never authorized this use of the PIC Image.

321. On information and belief, Sylvania never authorized this use of the PIC Image.

322. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (VA 1-916-443). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="354 974 630 1010">CF22EL_PAR38.tif</p>	
 <p data-bbox="444 1850 1175 1879">https://www.interlight.biz/light-bulb/SYLVANIA-29635</p>	

323. The above-captured webpage is owned and operated by Interlight.

324. The above-captured webpage includes a PIC Image.


325. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

326. PIC never authorized this use of the PIC Image.

327. On information and belief, Sylvania never authorized this use of the PIC Image.

328. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (VA 1-916-428). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="300 823 683 856">OSRAM_Backstage Blue.tif</p>	
 <p data-bbox="219 1831 1393 1860">https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-DOT-IT-BACKSTAGE-BLUE</p>	

329. The above-captured webpage is owned and operated by Interlight.



330. The above-captured webpage includes a PIC Image.

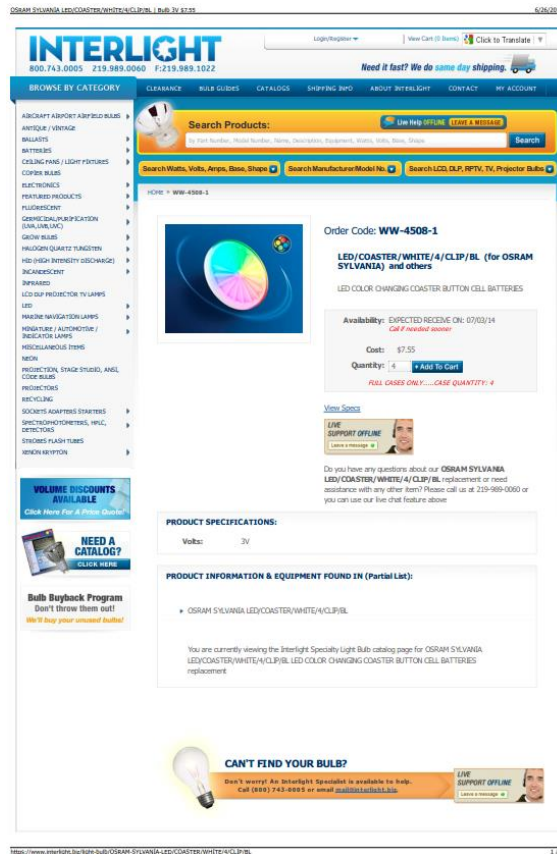
331. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

332. PIC never authorized this use of the PIC Image.

333. On information and belief, Sylvania never authorized this use of the PIC Image.

334. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (VA 1-916-418). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="313 842 670 873">LED Coasters_product.tif</p>	



<https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-LED/COASTER/WHITE/4/CLIP/BL>

335. The above-captured webpage is owned and operated by Interlight.

336. The above-captured webpage includes a PIC Image.

337. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

338. PIC never authorized this use of the PIC Image.

339. On information and belief, Sylvania never authorized this use of the PIC Image.

340. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on June 21, 2013 (VA 1-917-076). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p>HM_Metallogen 1200W_S copy.tif</p>	
 <p>https://www.interlight.biz/light-bulb/SYLVANIA-0023922</p>	

341. The above-captured webpage is owned and operated by Interlight.

342. The above-captured webpage includes a PIC Image.

343. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

344. PIC never authorized this use of the PIC Image.

345. On information and belief, Sylvania never authorized this use of the PIC Image.

346. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on June 21, 2013 (VA 1-917-094). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p>CF9EL_deco_cand copy.tif</p>	
	 <p>https://www.interlight.biz/light-bulb/SYLVANIA-CF9EL/B10/827/C/ADPT/BL2</p>

347. The above-captured webpage is owned and operated by Interlight.

348. The above-captured webpage includes a PIC Image.

349. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

350. PIC never authorized this use of the PIC Image.

351. On information and belief, Sylvania never authorized this use of the PIC Image.

352. In the table below, the image on the top left was authored by PIC. It was received by the Copyright Office on June 21, 2013. The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="305 745 673 783">Linear VARIOS_silver.jpg</p>	
 <p data-bbox="198 1795 1416 1829">https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-DOTIT/LINEARSWIVEL/SILV/6</p>	

353. The above-captured webpage is owned and operated by Interlight.

354. The above-captured webpage includes a PIC Image.




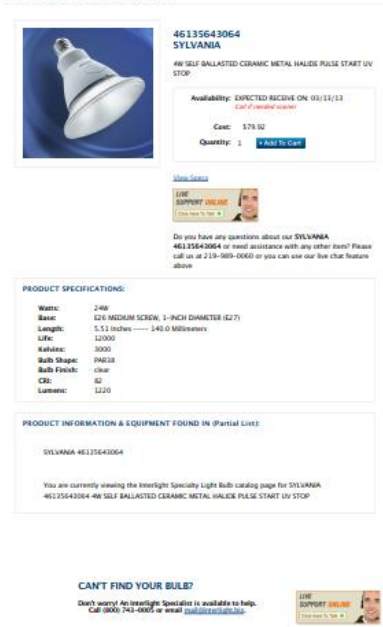
355. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

356. PIC never authorized this use of the PIC Image.

357. On information and belief, Sylvania never authorized this use of the PIC Image.

358. In the table below, the image on the top left was authored by PIC. It was received by the Copyright Office on June 21, 2013. The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="272 919 711 989">Metalarc Powerball HID057 EL Lamp_layered copy.tif</p>	
<p data-bbox="201 1045 386 1058">SYLVANIA 46135643064 Bulb 24W \$79.92</p> <p data-bbox="539 1045 792 1058">https://www.interlight.biz/light-bulb/SYLVANIA-46135643064</p>  <p data-bbox="201 1797 228 1810">1 of 3</p> <p data-bbox="730 1797 837 1810">3/6/13 5:01 PM 2 of 3</p> <p data-bbox="396 1852 1218 1885">https://www.interlight.biz/light-bulb/SYLVANIA-46135643064</p>	<p data-bbox="812 1029 1000 1041">SYLVANIA 46135643064 Bulb 24W \$79.92</p> <p data-bbox="1149 1029 1409 1041">https://www.interlight.biz/light-bulb/SYLVANIA-46135643064</p>  <p data-bbox="1344 1797 1409 1810">3/6/13 5:01 PM</p>

359. The above-captured webpage is owned and operated by Interlight.

360. The above-captured webpage includes a PIC Image.

361. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

362. PIC never authorized this use of the PIC Image.

363. On information and belief, Sylvania never authorized this use of the PIC Image.

364. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on June 21, 2013 (VA 1-917-079). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="365 1003 620 1039">G30 Globe_Red.tif</p>	
 <p data-bbox="289 1837 1323 1869">https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-LED1.5G30/F/R/RP</p>	

365. The above-captured webpage is owned and operated by Interlight.

366. The above-captured webpage includes a PIC Image.

367. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

368. PIC never authorized this use of the PIC Image.

369. On information and belief, Sylvania never authorized this use of the PIC Image.

370. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on June 21, 2013 (VA 1-917-079). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="302 936 682 1003">LED PAR 16 Retrofit_Both Bases_layered.tif</p>	
 <p data-bbox="500 1814 667 1829">https://www.interlight.biz/light-bulb/...</p> <p data-bbox="727 1814 894 1829">LED10PAR16/DIM/830/FL35 Bulb ...</p> <p data-bbox="1045 1814 1122 1829">6/23/14, 3:20 PM</p> <p data-bbox="383 1850 1230 1877">https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-78541</p>	

371. The above-captured webpage is owned and operated by Interlight.

372. The above-captured webpage includes a PIC Image.

373. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

374. PIC never authorized this use of the PIC Image.

375. On information and belief, Sylvania never authorized this use of the PIC Image.

376. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on June 21, 2013 (VA 1-917-079). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p>© Vivantus / PIC Corp</p> <p>solar FH 28w_60 copy.tif</p>	
	<p>OSRAM SYLVANIA LED/SOLAR/FLASHLIGHT/BL \$17.27 0.1...</p> <p>https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-LED/S...</p>  <p>1 of 2</p> <p>11/7/12 10:40 AM</p> <p>https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-LED/SOLAR/FLASHLIGHT/BL</p>

377. The above-captured webpage is owned and operated by Interlight.

378. The above-captured webpage includes a PIC Image.

379. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

380. PIC never authorized this use of the PIC Image.

381. On information and belief, Sylvania never authorized this use of the PIC Image.

382. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on June 21, 2013 (VA 1-917-079). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p>© 2013 PIC Corp</p> <p>SOLAR Flashlight_Product_layered copy.tif</p>	
<p>OSRAM SYLVANIA LED/SOLAR/FLASHLIGHT/BL \$17.27 0.1...</p> <p>https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-LED/S...</p>  <p>1 of 2</p> <p>https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-LED/SOLAR/FLASHLIGHT/BL</p>	<p>11/7/12 10:40 AM</p>

383. The above-captured webpage is owned and operated by Interlight.

384. The above-captured webpage includes a PIC Image.

385. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

386. PIC never authorized this use of the PIC Image.

387. On information and belief, Sylvania never authorized this use of the PIC Image.

388. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on June 21, 2013 (VA 1-916-412). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="264 917 719 953">DOT it UFO_Product_layered.tif</p>	
 <p data-bbox="212 1837 1409 1877">https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-LEDDOTITDISKWHITEPDQ8</p>	

389. The above-captured webpage is owned and operated by Interlight.



390. The above-captured webpage includes a PIC Image.

391. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

392. PIC never authorized this use of the PIC Image.

393. On information and belief, Sylvania never authorized this use of the PIC Image.

394. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on October 24, 2013 (VA 1-884-811). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="386 974 594 1010">LED20A19.jpg</p>	



<https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-LED14A19/DIM/O/827>

395. The above-captured webpage is owned and operated by Interlight.

396. The above-captured webpage includes a PIC Image.

397. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

398. PIC never authorized this use of the PIC Image.

399. On information and belief, Sylvania never authorized this use of the PIC Image.

400. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on May 30, 2006 (VA 1-359-243). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="235 1010 747 1045">Teen App_ColorChange_product.jpg</p>	
 <p data-bbox="362 1864 1250 1900">https://www.interlight.biz/light-bulb/SYLVANIA-NL/LED/RGB/CB</p>	

401. The above-captured webpage is owned and operated by Interlight.

402. The above-captured webpage includes a PIC Image.

403. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

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405. On information and belief, Sylvania never authorized this use of the PIC Image.

406. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (VA 1-916-450). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="245 974 737 1010">PO-Ent Brochure, Panel 5 copy.TIF</p>	
 <p data-bbox="326 1829 1284 1864">https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-046135540899</p>	

407. The above-captured webpage is owned and operated by Interlight.

408. The above-captured webpage includes a PIC Image.



409. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

410. PIC never authorized this use of the PIC Image.

411. On information and belief, Sylvania never authorized this use of the PIC Image.

412. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (VA 1-916-428). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p data-bbox="378 842 602 873">HMI 12000W.tif</p>	

SYLVANIA 0023925 | Bulb: 6000W 123V \$782.43 6062814

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HOME > WFF-SBGA-4



Order Code: WFF-SBGA-4

0023925 (for SYLVANIA) and others

DOUBLE ENDED METAL HALIDE HMI-6000W

Availability: **IN STOCK** Ship Immediately

Cost: \$782.43

Quantity:

[View Specs](#)

VIEW SUPPORT OFFLINE

Do you have any questions about our SYLVANIA 0023925 replacement or need assistance with any other item? Please call us at 219-989-0060 or you can use our live chat feature above

PRODUCT SPECIFICATIONS:

Wattage:	6000W
Voltage:	123V
Amps:	55A
Length:	17.72 inches --- 455.0 Millimeters
Life:	500
Hours:	6000
Bulb Base:	CLEAR
OS:	50
Lumens:	570000

PRODUCT INFORMATION & EQUIPMENT FOUND IN (Partial List):

SYLVANIA 0023925

You are currently viewing the Interlight Specialty Light Bulb catalog page for SYLVANIA 0023925 DOUBLE ENDED METAL HALIDE HMI-6000W replacement

CAN'T FIND YOUR BULB?

<https://www.interlight.biz/light-bulb/SYLVANIA-0023925> 1/3

<https://www.interlight.biz/light-bulb/SYLVANIA-0023925>

413. The above-captured webpage is owned and operated by Interlight.

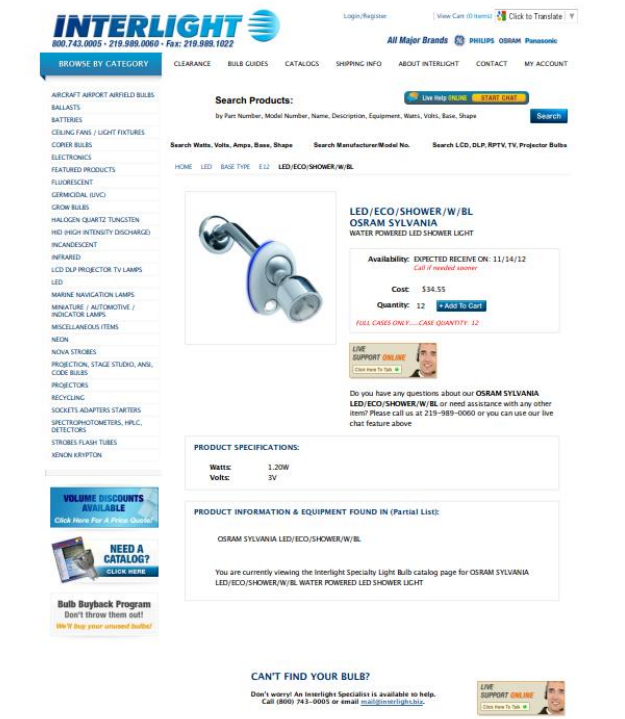
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PIC Image	Interlight's Infringing Copy
 <p>LED ShowerHead_exterior copy_v1.tif</p>	
<p>OSRAM SYLVANIA LED/ECO/SHOWER/W/BL \$34.55 1.20W 3... https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-LED/E...</p>  <p>1 of 2 11/7/12 10:38 AM</p> <p>https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-LED/ECO/SHOWER/W/BL</p>	

419. The above-captured webpage is owned and operated by Interlight.

420. The above-captured webpage includes a PIC Image.



421. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

422. PIC never authorized this use of the PIC Image.

423. On information and belief, Sylvania never authorized this use of the PIC Image.

424. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (VA 1-916-418). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p>LUXCap_Product_layered copy.tif</p>	

OSRAM SYLVANIA LED/BOTTLECAP/RGB/BL \$6.90 WATTS ... <https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-LED/B...>

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LED/BOTTLECAP/RGB/BL
OSRAM SYLVANIA
COLOR CHANGING LED BOTTLE CAP BUTTON CELL BATTERIES
INCLUDED

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Call if needed earlier

Cost: \$6.90
Quantity: 12 Add To Cart

FREE CASES ONLY...CALL QUANTITY: 12

Do you have any questions about our OSRAM SYLVANIA LED/BOTTLECAP/RGB/BL or need assistance with any other item? Please call us at 219-689-0080 or you can use our live chat feature above

PRODUCT SPECIFICATIONS:
Voltage: 3V

PRODUCT INFORMATION & EQUIPMENT FOUND BY (Partial List):
OSRAM SYLVANIA LED/BOTTLECAP/RGB/BL

You are currently viewing the Interlight Specialty Light Bulb catalog page for OSRAM SYLVANIA LED/BOTTLECAP/RGB/BL, COLOR CHANGING LED BOTTLE CAP BUTTON CELL BATTERIES INCLUDED

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1 of 2 11/7/12 10:35 AM

<https://www.interlight.biz/light-bulb/OSRAM-SYLVANIA-LED/BOTTLECAP/RGB/BL>

425. The above-captured webpage is owned and operated by Interlight.

426. The above-captured webpage includes a PIC Image.

427. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

428. PIC never authorized this use of the PIC Image.

429. On information and belief, Sylvania never authorized this use of the PIC Image.

430. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (VA 1-916-456). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p>7625_HO54W_SLS_V2_Silo_Etch_SeamLe ss.tif</p>	
	 <p>INTERLIGHT 800.743.0005 219.989.0060 F:219.989.1022</p> <p>Need it fast? We do same day shipping.</p> <p>Search Products: [Search]</p> <p>Order Code: WW-7671-7</p> <p>20098 (for SYLVANIA) and others</p> <p>14W, T5 HE SEAMLESS FLUORESCENT LAMP, 3000K COLOR TEMPERATURE</p> <p>Availability: EXPECTED RECEIVE ON: 07/03/14 <i>Call if needed sooner</i></p> <p>Cost: \$24.67</p> <p>Quantity: 25 Add To Cart</p> <p><i>FULL CASES ONLY...CASE QUANTITY: 25</i></p> <p>PRODUCT SPECIFICATIONS:</p> <p>Watts: 14W Base: G5 HO/HU/LE BPH Length: 22.51 inches — 582.0 Millimeters Kelvins: 3000 Bulb Shape: T5 Lumen: 1200</p> <p>PRODUCT INFORMATION & EQUIPMENT FOUND IN (Partial List):</p> <p>SYLVANIA 20098</p> <p>You are currently viewing the Interlight Specialty Light Bulb catalog page for SYLVANIA 20098 14W, T5 HE SEAMLESS FLUORESCENT LAMP, 3000K COLOR TEMPERATURE replacement.</p> <p>CAN'T FIND YOUR BULB?</p>

<https://www.interlight.biz/light-bulb/SYLVANIA-20098>

431. The above-captured webpage is owned and operated by Interlight.

432. The above-captured webpage includes a PIC Image.

433. The above-captured webpage includes a PIC Image without the PIC Copyright

Management Information.

434. PIC never authorized this use of the PIC Image.

435. On information and belief, Sylvania never authorized this use of the PIC Image.

436. In the table below, the image on the top left was authored by PIC and then registered with the Copyright Office on January 8, 2013 (VA 1-916-456). The image on the top right appears on a webpage of Defendant's website, pictured in the second row.

PIC Image	Interlight's Infringing Copy
 <p>7625_HO54W_SLS_V2_Silo_Etch_SeamLe ss.tif</p>	
 <p>https://www.interlight.biz/light-bulb/FP14/HE/SLS/830</p>	

437. The above-captured webpage is owned and operated by Interlight.

438. The above-captured webpage includes a PIC Image.

439. The above-captured webpage includes a PIC Image without the PIC Copyright Management Information.

440. PIC never authorized this use of the PIC Image.

441. On information and belief, Sylvania never authorized this use of the PIC Image.

DAMAGE TO PIC'S BUSINESS AND REPUTATION

442. PIC's photography services and images enjoy an excellent reputation and have gained great value and recognition in the marketplace.

443. For over three decades PIC has done business under the PIC name and has used the name of PIC's President, Paul Kevin Picone, in connection with PIC's services. Through PIC's longstanding practice of attaching to each published PIC Image, or including therewith, the names "P.I. Corp." and "Paul Kevin Picone," consumers have come to associate these names with high-quality photography. PIC thus has common law trademark rights in the P.I. CORP. and PAUL KEVIN PICONE marks ("PIC Marks").

444. PIC relies on the PIC Marks and Copyright Management Information that it attaches to each of its images, or includes therewith, as its primary mode of advertising. Potential customers seek out and contact PIC using this information.

445. PIC is not affiliated with Interlight and has not approved any of Interlight's uses of or alterations to PIC Images.

446. By removing the PIC Marks and Copyright Management Information from the PIC Images, Interlight has removed PIC's primary advertisement vector, thereby depriving PIC of business opportunities.

447. By replacing the PIC Marks and Copyright Management Information on the PIC Images with false Interlight copyright management information, Interlight has created a likelihood that consumers will mistakenly believe that Interlight created the PIC Images. Interlight's doctoring of the PIC Images misleadingly represents to the world that Interlight – and not PIC – is the author, source, and copyright owner of the PIC Images displayed on Interlight's website.

448. Interlight, by its misdeeds, has created a likelihood that potential PIC customers will erroneously believe Interlight to be the source and owner of the PIC Images. Interlight's misrepresentation and the resulting likelihood of consumer confusion have damaged PIC.

COUNT I
(Copyright Infringement, 17 U.S.C. § 501)

449. PIC repeats and re-alleges the allegations of the paragraphs above as though fully set forth herein.

450. Interlight has infringed PIC's copyrights in its PIC Images, in violation of 17 U.S.C. § 501, by copying, distributing, and/or using PIC Images without license or other authorization.

451. Interlight's infringement has been knowing and willful.

452. Interlight's infringement has damaged PIC in an amount to be proven at trial.

453. Unless stopped by an injunction, Interlight will continue infringing PIC's copyrights in its PIC Images and will cause PIC to suffer irreparable harm for which there is no adequate remedy at law. Therefore, PIC is entitled to injunctive relief.

COUNT II
(Integrity of Copyright Management Information, 17 U.S.C. § 1202)

454. PIC repeats and re-alleges the allegations of the paragraphs above as though fully set forth herein.

455. On information and belief, Interlight has knowingly and with intent to induce, enable, facilitate, or conceal infringement of the PIC Images, provided and/or distributed false copyright management information in relation to its use of the PIC Images, in violation of 17 U.S.C. § 1202(a).

456. On information and belief, Interlight has intentionally removed or altered PIC Copyright Management Information for the PIC Images without PIC's authorization, and/or distributed copyright management information with knowledge that the PIC Copyright Management Information was removed or altered without PIC's authorization, in violation of 17 U.S.C. § 1202(b).

457. On information and belief, Interlight's violation of 17 U.S.C. § 1202 has been knowing and willful.

458. Interlight's violation of 17 U.S.C. § 1202 has damaged PIC in an amount to be proven at trial.

459. Unless stopped by an injunction, Interlight's behavior will continue and will cause PIC to suffer irreparable harm for which there is no adequate remedy at law. Therefore, PIC is entitled to injunctive relief.

COUNT III
(Lanham Act Violations, 15 U.S.C. § 1125(a))

460. PIC repeats and re-alleges the allegations of the paragraphs above as though fully set forth herein.

461. PIC possesses common law trademark rights in the PIC Marks.

462. Interlight has used the PIC Images in commerce in connection with its sale of Interlight's goods and services.

463. On information and belief, Interlight stripped the PIC Marks and Copyright Management Information from the PIC Images. Without PIC's authorization, Interlight added false Interlight copyright management information to PIC Images.

464. Interlight doctored PIC Images to give the misleading appearance that Interlight is the creator and copyright owner of the PIC Images. Consumers are thus likely to be deceived as to the true origin of the PIC Images.

465. Customers who are familiar with PIC's decades of work for Sylvania and who recognize the Accused Images as PIC's are likely to mistakenly believe that Interlight and PIC are in some way affiliated, connected, or associated as a result of Interlight's misuse of the PIC Marks, Copyright Management Information and Images. Interlight's misconduct is also likely to deceive such consumers by causing them to believe that PIC sponsors or approves of Interlight's goods, services, or commercial activities. Interlight's misconduct violates 15 U.S.C. § 1125(a)(1)(A).

466. Interlight's unauthorized alteration and use of PIC Images, Marks, and Copyright Management Information occurs in commercial advertising or promotion, and misrepresents the

nature, characteristics, qualities, or geographic origin of Interlight's goods, services, or commercial activities, in violation of 15 U.S.C. § 1125(a)(1)(B).

467. On information and belief, Interlight's misuse of PIC Marks, Copyright Management Information and Images, and Interlight's acts and/or omissions as described above were knowing and willful.

468. Interlight's violations of the Lanham Act have damaged PIC in an amount to be determined at trial.

469. Unless stopped by an injunction, Interlight's behavior will continue and will cause PIC to suffer irreparable harm for which there is no adequate remedy at law. Therefore, PIC is entitled to injunctive relief.

COUNT IV
(Unfair And Deceptive Trade Practices, Mass. Gen. L. ch. 93A)

470. PIC repeats and re-alleges the allegations of the paragraphs above as though fully set forth herein.

471. Interlight is, and at all relevant times has been, engaged in commerce.

472. Interlight's acts and/or omissions as described above (and the center of gravity of those acts and/or omissions) occurred primarily and substantially in Massachusetts.

473. Interlight's acts and/or omissions as described above constitute unfair and deceptive trade practices under Mass. Gen. L. Ch. 93A.

474. Interlight's unfair and deceptive trade practices impact the public interest by causing consumer confusion.

475. Interlight's acts and/or omissions as described above were knowing and willful.

476. Interlight's unfair and deceptive trade practices damaged PIC in an amount to be determined at trial.

477. Unless stopped by an injunction, Interlight's behavior will continue and will cause PIC to suffer irreparable harm for which there is no adequate remedy at law. Therefore, PIC is entitled to injunctive relief.

RELIEF REQUESTED

WHEREFORE, PIC requests that this Court:

A. Enter judgment that the Court has jurisdiction over the parties to and subject matter of this action.

B. Enter judgment that Interlight has infringed and continues to infringe PIC's copyrights in and to the PIC Images, pursuant to 17 U.S.C. § 501.

C. Permanently enjoin Interlight, including its partners, officers, agents, servants, employees, attorneys, and all those persons and entities in active concert or participation with them, from further infringement of the copyrights in and to the PIC Images, pursuant to 17 U.S.C. § 502.

D. Order the recall, impounding, and destruction of all infringing copies made, used or distributed by Interlight in violation of PIC's exclusive rights in and to its PIC Images (and, in the case of electronic copies, order that all such copies be deleted from the computers or other storage means on which they reside), pursuant to 17 U.S.C. § 503.

E. Direct Interlight to pay to PIC its actual damages and any additional profits realized by Interlight, pursuant to 17 U.S.C. § 504.

F. Order that, in the alternative to actual copyright damages, at PIC's election, Interlight shall pay PIC statutory damages pursuant to 17 U.S.C. § 504.

G. Enter judgment that Interlight has violated and continues to violate the Digital Millennium Copyright Act in relation to the PIC Images, pursuant to 17 U.S.C. § 1202.

H. Permanently enjoin Interlight, including its partners, officers, agents, servants, employees, attorneys, and all those persons and entities in active concert or participation with them, from further violations of the Digital Millennium Copyright Act in relation to the PIC Images, pursuant to 17 U.S.C. § 1203(b)(1).

I. Order the impounding of all devices or products in the custody or control of Interlight that were involved in the violations of the Digital Millennium Copyright Act in relation to the PIC Images, pursuant to 17 U.S.C. § 1203(b)(2).

J. Direct Interlight to pay to PIC its actual damages and any additional profits realized by Interlight, pursuant to 17 U.S.C. §§ 1203(b)(3), 1203(c)(1)(A), and 1203(c)(2).

K. Order that, in the alternative to actual damages, at PIC's election, Interlight shall pay PIC statutory damages pursuant to 17 U.S.C. §§ 1203(b)(3), 1203(c)(1)(B), and 1203(c)(3)(B).

L. Enter judgment that PIC has common law trademark rights in the PIC Marks, and that Interlight has violated and continues to violate 15 U.S.C. § 1125(a)(1)(A) and (B) by its alteration and use of PIC Images.

M. Permanently enjoin Interlight, including its partners, officers, agents, servants, employees, attorneys, and all those persons and entities in active concert or participation with them, from further violations of the Lanham Act in relation to the PIC Images, pursuant to 15 U.S.C. § 1116.

N. Direct Interlight to pay to PIC any damages attributable to Interlight's Lanham Act violations and shall account for all gains, profits, and advantages derived through those actions, but not less than a reasonable royalty, and pay such damages authorized by law, including 15 U.S.C. § 1117.

O. Enter judgment that Interlight has engaged and continues to engage in unfair and deceptive trade practices in violation of Mass. Gen. L. ch. 93A.

P. Direct Interlight to pay to PIC its damages sustained as a result of Interlight's unfair and deceptive trade practices.

Q. Permanently enjoin Interlight, including its partners, officers, agents, servants, employees, attorneys, and all those persons and entities in active concert or participation with them, from committing further unfair and deceptive trade practices, pursuant to Mass. Gen. L. ch. 93A.

R. Enter judgment that Interlight's copyright infringements, Lanham Act violations, and unfair and deceptive trade practices have been knowing and willful.

S. Enter judgment that Interlight's 17 U.S.C. § 1203(a) violations of the Digital Millennium Copyright Act have been knowing and with intent to induce, enable, facilitate, or conceal infringement.

T. Enter judgment that Interlight's 17 U.S.C. § 1203(b) violations of the Digital Millennium Copyright Act have been knowing and intentional.

U. Order Interlight to file and serve a report in writing, and under oath, setting forth the manner and form in which it has complied with the Court's order and injunction.

V. Award PIC its legal fees and costs in prosecuting this action, pursuant to 17 U.S.C. §§ 505, 1203(b)(5); 15 U.S.C. § 1117; Mass. Gen. L. ch. 93A, or other applicable law.

W. Award PIC treble damages pursuant to Mass. Gen. L. ch. 93A or other applicable law.

X. Award PIC such further relief as this Court may deem just and proper.

JURY DEMAND

PIC hereby demands a trial by jury of all issues so triable.

Respectfully submitted,

PHOTOGRAPHIC ILLUSTRATORS
CORPORATION,

By its counsel,

Dated: November 26, 2014

/s/ Michael N. Rader

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